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May 30, 2003

EPA Region 5 Records Ctr.



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VIA FEDERAL EXPRESS

Ms. Eileen L. Furey
Associate Regional Counsel (C-14J)
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, IL 60604-3507

Re: Allied Paper/Portage Creek/Kalamazoo River Superfund Site in Kalamazoo and Allegan
Counties, Michigan

Dear Ms. Furey:

As you know, this firm represents the City of Plainwell with regard to the above-referenced site. Pursuant to the U.S. Environmental Protection Agency's (EPA's) Request for Information directed to the City of Plainwell, dated March 28, 2003, (and received by me on March 31, 2003), enclosed please find the City of Plainwell's Response to the Requests For Information which have been signed by Bryan Pond, Superintendent of Wastewater Treatment.

On behalf of the City of Plainwell, we consider that the City of Plainwell has fully responded to this U.S. EPA's CERCLA Section 104(e), 42 U.S.C. §9604(e), Request for Information. Please advise the undersigned immediately upon receipt of this transmittal if you determine our response to be inadequate in any respect.

Sincerely,

LEWIS REED & ALLEN P.C.

Michael B. Ortega

MBO:kjn

Enclosure

cc: Mr. Pond w/enclosure

**CITY OF PLAINWELL'S RESPONSE TO USEPA'S MARCH 28, 2003
REQUESTS FOR INFORMATION PURSUANT TO SECTION 104E
OF CERCLA FOR ALLIED PAPER/PORTAGE CREEK/KALAMAZOO RIVER
SUPERFUND SITE IN KALAMAZOO AND ALLEGAN COUNTIES, MICHIGAN**

1. Identify all persons consulted in the preparation of the responses to these Information Requests.

Response: Bryan Pond, Superintendent of Wastewater Treatment; Sandra Lamorandier, Human Resources Director, Noreen Farmer, City Clerk; Michael Ortega, Environmental Legal Counsel.

2. Identify all documents consulted, examined, or referred to in the preparation of the responses to these Information Requests and provide copies of all such documents.

Response: See attachments 5, 15, 16, 17 and 18.

3. If you have reason to believe that there may be a person(s) able to provide a more detailed or complete response to any Information Request, or who may be able to provide additional responsive documents, identify any such person(s).

Response: None known.

POTW or Other Treatment Facility Ownership

4. Identify each publicly-owned treatment works or similar treatment facility (hereinafter "POTW") owned or operated by the City of Plainwell at any time during the relevant period that discharged wastewaters directly or indirectly to the Kalamazoo River or tributaries thereof. Identify each POTW by current name and address, if available.

Response: City of Plainwell Wastewater Treatment Plant, 129 Fairlane Street, Plainwell, MI 49080

5. For each POTW identified in response to Request #4, provide a detailed history of the ownership and operation of the facility during the relevant period. The detailed history should identify: (1) each owner and operator of the POTW during the relevant period; (2) for each owner or operation, the period of ownership or operation to the nearest month; (3) any parent corporation or other authority for any period when the facility was not publicly owned and operated; and (4) the current mailing address for each owner, operator, parent corporation or other authority.

Response: The facility was owned and operated by the City of Plainwell during

the time period in question. The list of persons working as Superintendent of Wastewater Treatment is as follows:

January 1954 (Sept 1943) - April 1983

Joe Denier

Deceased

May 1983 - January 1988

Tim Taylor

Unknown

February 1988 - September 1988

Steve Wolf

Unknown

September 1988 - February 1995

Donald Murdick

Deceased

February 1995 - August 1995

Jerry Lawrence

126 Fairlane Street

Plainwell, MI 49080

August 1995 - Present

Bryan Pond

129 Fairlane Street

Plainwell, MI 49080

Paper Company Wastewaters

6. During the relevant period, did any POTW under your ownership, operation or control ever accept for co-treatment with municipal wastewaters, or accept for separate treatment, process wastewaters or other material from any person engaged in the production of pulp, paper, or paperboard products ("paper products") from virgin fiber (wood pulp derived directly from trees) or from secondary fiber (reused cardboard, paper or paper products, including pre-and post-consumer recycled materials)? The term "process wastewaters" means wastewaters generated during the manufacture of pulp, paper or paperboard products, exclusive of sanitary wastewaters. (A list of person who, U.S. EPA believes, engaged in the production of paper products at and near the Site during the relevant period is enclosed as Attachment 4, but there may be additional persons known to you that are not included on the list.)

Response: The City of Plainwell Wastewater Treatment Plant has never

received any "process wastewaters" from any person engaged in the production of paper products. To the best of the City's knowledge, all "process wastewaters" generated by paper production operations conducted by the various owners and/or operators of the 200 Allegan Street facility were handled and treated on site at that facility. The City of Plainwell Wastewater Treatment Plan did accept "other material", specifically and limited to sanitary wastewater, from the facility at 200 Allegan Street throughout the relevant period.

7. If the answer to Request #6 is "yes", identify each person engaged in the production of paper products from whom you accepted process wastewaters or other material for treatment during the relevant period. Provide, if available, the current mailing address of each person so identified

Response: To the best of the City's knowledge, the entities which generated the "other material", specifically and limited to sanitary wastewater, are those entities identified on USEPA's Attachment No. 4 as having engaged in the production of paper products during the relevant period at 200 Allegan Street

Other Industrial Wastewaters Containing PCBs

- 8 Other than the persons identified in response to Request #7, during the relevant period did any POTW under your ownership, operation or control ever accept process wastewaters or other materials containing PCBs or PCB compounds from any person, including industrial or commercial users of the sewerage system?

Response: No.

- 9 If your answer to Request #8 is "yes", identify each person from whom a POTW under your ownership, operation or control accepted process wastewaters or other material containing PCBs or PCB compounds for treatment during the relevant period. Provide, if available, the current mailing address of each person so identified

Response: Not applicable

Treatment Facilities

- 10 For each POTW owned and operated by you that accepted process wastewaters from any person identified in response to Request #7 or Request #9, provide the following information
 - a Identify the POTW, and its current address (if available).

Response: Not applicable.

- b. Identify the year and month that POTW primary wastewater treatment facilities were placed in operation. Provide a simplified schematic diagram of the wastewater treatment facilities of the POTW as then configured, showing each major treatment unit of the POTW, including sludge handling facilities and dry weather and maximum hydraulic design wastewater flow rates.

Response: Not applicable.

- c. Identify the year and month that POTW secondary (biological) wastewater treatment facilities were placed in operation. Provide a simplified schematic diagram of the wastewater treatment facilities as then configured, showing each major treatment unit of the POTW, including sludge handling facilities and dry weather and maximum hydraulic design wastewater flow rates.

Response: Not applicable.

- d. Identify the year and month that POTW advanced (post-secondary) wastewater treatment facilities were placed in operation. Provide a simplified schematic diagram of the wastewater treatment facilities as then configured, showing each major treatment unit, including sludge handling facilities and dry weather and maximum hydraulic design wastewater flow rates.

Response: Not applicable.

Effluent Flow

11. For each POTW owned or operated by you that accepted process wastewaters from any person identified in response to Request #7 or Request #9, identify the monthly average POTW effluent flow in million gallons per day (mgd) for each month during the relevant time period.

Response: Not applicable.

Total Suspended Solids

12. For each POTW owned or operated by you that accepted process wastewaters from any person identified in response to Request #7 or Request #9, identify the monthly average POTW untreated wastewater, primary effluent, secondary effluent, as well as the final effluent total suspended solids (TSS) concentration

(mg/l) and mass loading (lbs/day) for each month during the relevant period.

Response: Not applicable.

POTW and Sewer System Bypassing

13. For each POTW owned or operated by you that accepted process wastewaters from any person identified in response to Request #7 or Request #9, identify, on a monthly basis during the relevant time period, all available information and data regarding bypasses to the Kalamazoo River, or tributaries thereof; (1) of untreated sewage from the sewerage system tributary to the POTW; (2) of untreated sewage at the POTW headworks; and (3) of partially treated sewage from any point within the POTW (e.g., after primary treatment). Information may be in the form of monitored bypasses where flow records are available; actual or estimated time of bypass events; engineering estimates or studies that provide information on the occurrence of bypasses during specific rainfall events (e.g., amount of bypassing expected with a rainfall of one inch in 24 hours); engineering studies for upgrade of the sewerage systems to eliminate or minimize bypasses; and, any recollections of the frequency and extent of bypasses for discrete time periods based on dates upgrades to the sewerage system and/or POTW were made.

Response: Not applicable.

PCB Data

14. For each POTW owned or operated by you that accepted process wastewaters from any person identified in response to Request #7 or Request #9, identify all data (daily, monthly or annual during the relevant period) for PCBs and PCB compounds for sewerage system and POTW bypass flows; the POTW influent flow, primary effluent flow, secondary treatment effluent flow; final effluent flow if different than the secondary effluent flow; and primary, secondary and combined wastewater sludge. Results from any historical or archived samples must be included in the response to this request.

Response: Not applicable.

Sludge Data

15. Identify the monthly amount of wastewater sludge generated at the POTW (tons/month, dry weight basis) during the relevant period, and describe the disposal method and disposal location for the sludge.

Response: See attachment 15.

Process Wastewaters

16. For each person identified in response to Request #7 or Request #9, provide the following information:

- a. Identify the name of the person, including the names of any successor owners or operators, during the entire period of time when you accepted process wastewaters from this person for discharge to the POTW;

Response: Not applicable.

- b. Identify, to the nearest month, the period during which each person identified in response to Request #7 or Request #9 discharged process wastewaters or other material to the POTW; the monthly average process wastewater flow from that person; the monthly average TSS concentration (mg/l) and TSS mass loading (lbs/day) discharged from that person to the POTW; and any all PCB data for the process wastewater or other material discharged from that person to the POTW. Results from any historical or archived samples must be included in the response to this request.

Response: The City never received “process wastewaters” from any of the persons referenced in Request #7, above. The City did receive, during the relevant period, “other material”, specifically and limited to sanitary wastewater from the persons referenced in response to Request #7, above. The City has no records of “monthly average TSS”. However, some information regarding TSS limits are included in the materials within Attachment 16. The City has no “PCB data” for the “other material”, i.e., sanitary wastewater, and the City is aware of no information of any kind indicating that the sanitary wastewater contained any PCBs.

- c. Identify and produce all correspondence, notes of meetings, or any other documentation regarding the presence of PCBs in the wastewaters discharged to the sewerage system and any of your POTWs by each person identified in response to Request #7 or Request #9.

Response: The City is aware of no such documentation, except that the permits issued to Plainwell, Inc. to regulate the sanitary discharge to the City contained provisions prohibiting any discharge of any PCBs to the City. See Attachment 16.

PCB Discharge Limits

17. Identify all regulations, laws, ordinances or other regulatory controls that limited, directly or indirectly, the discharge of PCB-containing wastewaters to any of your

POTWs during the relevant period.

Response: See attachment 17.

POTW Permits

18. Identify all federal, state, municipal, or local permits ever issued to you during the relevant period that address the release of any pollutants or hazardous substances, in effluents or in any other manner, to surface waters or sediments. This request includes, but is not limited to, copies of all National Pollutant Discharge Eliminations System ("NPDES") or state permits or orders, issued pursuant to the Federal Water Pollution Control Act, 33 U.S.C. §§ 1251 *et seq.*, or Michigan law, U.S. Army Corps of Engineers permits. For each such issued permit, provide a copy of both the permit and the permit application.

Response: See attachment 18.

Industrial User Permits

19. For each person identified in response to Request #7 or Request #9, provide copies of all industrial user permits, respective baseline monitoring reports and sewer use agreements issued or prepared for the relevant period.

Response: See Attachment 16.

Document Retention

20. Provide a copy of each document retention policy that has been in existence at the wastewater treatment facility during the relevant period. If no written policy exists, describe in detail the guidelines and criteria followed by you during the relevant period to determine when documents are discarded, destroyed or retained.

Response: The City of Plainwell Wastewater Treatment Plant has no written document retention policy. Donald Murdick began to organize and file paperwork during his tenure as Superintendent, Circa September 1988 through February 1995. Superintendent Bryan Pond has continued to organize and file relevant paperwork, and has disposed of documents that no longer were useful or relevant. Current Michigan Department of Environmental Quality guidelines were referenced.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties or submitting false information, including the possibility of fine and imprisonment for knowing violations.

Dated: May 29, 2003

City of Plainwell

By: 

Bryan Pond

Its: Superintendent of Wastewater
Treatment

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